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- subtracting the second quantity of residual samples from the refined prediction value to generate a final representation, when so indicated.

In making out the rejection of this claim, the Office argues that Radha discloses all of the subject matter of this claim except for “subtracting the second quantity of residual samples” and “wherein the indication comprises one or more values associated with one or more picture-level parameters”. For these features, the Office relies on Rose and Takashima respectively. The Office argues that the motivation to combine the teachings of these references would be to “obtain an apparatus that operates more efficiently by being able to take advantage of addition information given to a system.”

Applicant respectfully traverses this rejection and submits that the Office has not established a *prima facie* case of obviousness. First, Applicant respectfully submits that Radha does not disclose “receiving an *indication* of whether there are first and second quantities of residual samples remaining for refining the prediction, *on a per-region basis*”. (emphasis added). Specifically, the Office relies on the movement of an apparatus (which is not identified or specified by the Office) between layers as being equivalent to an “indication”, as claimed. Applicant submits that the act itself of moving “from one layer to the next” in Radha cannot be equated with “receiving an indication”, as claimed – especially when considering the language recites “adding...and subtracting...*when so indicated*” and “wherein the indication comprises one or more values...”, as claimed. (emphasis added). In addition, Nothing in Radha indicates “*on a per-region basis*”, as claimed. (emphasis added). Furthermore,

1 contrary to the Office's argument, there is no distinction between a first and  
2 second quantity of residual samples in Radha.

3 Second, Fig. 5 of Rose does not disclose "subtracting the second quantity of  
4 residual samples from the refined prediction value *to generate a final*  
5 *representation*", as claimed. (emphasis added). Instead, Fig. 5 shows subtracting  
6 predicted frames in the base layer and first and second enhancement layers to  
7 obtain respective prediction errors (see Rose, Column 5, lines 10-20).

8 Third, the Office's reliance on Takashima as disclosing "one or more  
9 values associated with one or more picture-level parameters" is misplaced  
10 because, even if the act of moving "from one layer to the next" in Radha could be  
11 equated with "an indication", which it cannot, the act itself of moving cannot  
12 comprise values - at least in the context of Radha and this claim. In other words,  
13 the *act of moving* and the characteristic of *comprising one or more values* are  
14 incongruous.

15 Fourth, as Applicant submitted in its previous responses, the Office's stated  
16 motivation (to improve efficiency) is too general because it could cover almost  
17 any alteration contemplated of Radha and does not address *why* this specific  
18 proposed modification would have been obvious. In fact, in so far as Rose is  
19 concerned with "being able to take advantage of *addition information* given to a  
20 system", as the Office itself indicates, it appears to teach directly away from the  
21 subject matter of this claim.

22 Furthermore, even if the act of moving in Radha could be modified to  
23 "comprise one or more values...", as claimed, which it cannot, it remains unclear  
24 why one would be motivated to modify Radha with the teachings of Takashima in  
25 the proposed manner when such a modification would clearly have no effect,

1 whatsoever, on Radha with regard to its operating “more efficiently”. In other  
2 words, the Office’s stated motivation is simply irrelevant with respect to the  
3 proposed combination of Radha and Takashima.

4 In view of the above discussion, the Office has not established a *prima*  
5 *facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

6 **Claims 2-9** depend from claim 1 and are allowable as depending from an  
7 allowable base claim. These claims are also allowable for their own recited  
8 features which, in combination with those recited in claim 1, are neither disclosed  
9 nor suggested in the references of record, either singly or in combination with one  
10 another.

11 Additionally, regarding **claims 4 and 7**, Applicant respectfully submits that  
12 the Office’s reliance on what the region of content in Radha “could comprise” is  
13 misplaced because to establish a *prima facie* case of obviousness, the prior art  
14 reference (or references when combined) must teach or suggest all the claim  
15 limitations. (*In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)).  
16 Furthermore, the Office has not provided any motivation as to *why* an artisan  
17 would have utilized a macroblock with respect to the region of content.

18 **Claim 10** recites a medium comprising a plurality of executable  
19 instructions which, when executed, implement a decoder of media content to  
20 generate a motion compensated prediction of at least a region of media content, to  
21 receive an indication of one or more sets of samples of residual information to  
22 further refine the prediction, wherein the indication comprises one or more values  
23 associated with one or more picture-level parameters, and to add a first set of such  
24 samples to the prediction to generate a modified prediction, if indicated, and to  
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1 subtract a second set of such samples from the modified prediction to generate a  
2 final motion compensated prediction of the region, if indicated.

3 In making out the rejection of this claim, the Office relies on the same  
4 argument that it made with respect to claim 1. Therefore, for the reasons set forth  
5 above, applicant respectfully traverses this rejection.

6 Accordingly, in view of the above discussion, the Office has not established  
7 a *prima facie* case of obviousness. Hence, for at least this reason, this claim is  
8 allowable.

9 **Claims 11-14** depend from claim 10 and are allowable as depending from  
10 an allowable base claim. These claims are also allowable for their own recited  
11 features which, in combination with those recited in claim 10, are neither disclosed  
12 nor suggested in the references of record, either singly or in combination with one  
13 another.

14 Additionally, regarding claim 12, Applicant respectfully submits that the  
15 Office's reliance on what the region of content in Radha "could comprise" is  
16 misplaced. Furthermore, the Office has not provided any motivation as to *why* an  
17 artisan would have utilized a macroblock with respect to the region of content.

18 **Claim 15** recites a computing system comprising:

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- 20 • a decoder application to receive a region of media content and  
control generation of decoded media content; and
  - 21 • an application program interface (API), communicatively coupling  
22 the decoder application with a hardware accelerator, wherein if the  
23 API receives an indication of one or more sets of residual samples,  
24 the first set of samples is added to a motion compensated prediction  
to generate a refinement of a prediction value, when so indicated,  
25 and a second set of samples is subtracted from the refined prediction  
value to generate a final representation, when so indicated.

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2 In making out the rejection of this claim, the Office relies on the same  
3 argument that it made with respect to claims 1 and 15. In addition, the Office  
4 argues that Fig. 10 (blocks 52 and 54) of Radha discloses a hardware accelerator  
5 and Column 9 (lines 57-59) discloses an application program interface (API), as  
6 claimed.

7 Applicant traverses this rejection and respectfully submits that for all of the  
8 reasons set forth above, the Office has failed to establish a *prima facie* case of  
9 obviousness. In addition, Column 9 (lines 57-59) of Radha simply does not  
10 disclose an “application program interface (API), communicatively coupling the  
11 decoder application with a hardware accelerator”, as claimed. This is not  
12 surprising because blocks 52 and 54, depicted in Fig. 10, do not disclose or  
13 suggest a “hardware accelerator”, as claimed. Furthermore, even if these blocks  
14 did disclose a “hardware accelerator”, which they do not, they are actually part of  
15 the decoder itself. (see Fig. 10 and column 9, lines 64-67 through column 10,  
16 lines 1-7).

17 Accordingly, in view of the above discussion, the Office has not established  
18 a *prima facie* case of obviousness. Hence, for at least this reason, this claim is  
19 allowable.

20 **Claims 16-20** depend from claim 15 and are allowable as depending from  
21 an allowable base claim. These claims are also allowable for their own recited  
22 features which, in combination with those recited in claim 15, are neither disclosed  
23 nor suggested in the references of record, either singly or in combination with one  
24 another.  
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1        Additionally, regarding claim 18, Applicant respectfully submits that the  
2        Office's reliance on what the region of content in Radha "could comprise" is  
3        misplaced. Furthermore, the Office has not provided any motivation as to *why* an  
4        artisan would have utilized a macroblock with respect to the region of content.

5  
6        **Conclusion**

7        All of the claims are in condition for allowance. Accordingly, Applicant  
8        requests a Notice of Allowability be issued forthwith. If the Office's next  
9        anticipated action is to be anything other than issuance of a Notice of Allowability,  
10       Applicant respectfully requests a telephone call for the purpose of scheduling an  
11       interview.

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16       Dated: 10/18/06

Respectfully Submitted,

By: 

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